

LAW OFFICE OF ROBERT OSUNA, PC  
11 PARK PLACE, SUITE 1100  
NEW YORK, NEW YORK 10007  
212.233.1033  
ROBERTOSUNAPC@YAHOO.COM

August 7, 2025

Hon. Alvin K. Hellerstein  
U.S. District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

***Re: USA v. Erasmo Martinez, 06-cr-1014 (AKH)***  
***Request to Extend Time to File Motions***

Dear Judge Hellerstein,

My office represents Mr. Martinez, the defendant in the above matter.

I am requesting an additional sixty (60) days extension to file motions on this case.

I have conferred with the government, and they consent to my request.

AUSA Stone and I continue to engage in plea discussions and will use this additional time to work towards a resolution on this case.


I thank Your Honor for your time and attention to this matter.

Sincerely,

/s/

Law Office of Robert Osuna, PC  
By: Robert Osuna, Esq.

**Defendant shall file any motions by October 8, 2025. The Government's opposition shall be due by October 22, 2025. Defendant's reply is due October 29, 2025. The parties shall appear for a status conference, as previously scheduled, on September 4, 2025 at 10:00 a.m. in Courtroom 14D.**

  
Alvin K. Hellerstein, U.S.D.J.  
Dated: August 7, 2025